

ARMENIA GROWERS COALITION

August 2, 2018

I am contacting you on behalf of the newly formed Armenia Growers Coalition related to water quality issues in our community. The Armenia Growers Coalition is made up of three local farming operations in the area—Wysocki Produce Farms, B&D Farms and Okray Farms. We have become aware that recent tests of some private wells in this area indicate elevated levels of nitrates in the groundwater. We realize this is possibly due to legacy agricultural practices going back as far as the 1950's. While there is still much we need to learn about this situation, the Armenia Growers Coalition wants to be a part of the solution. We are just one of many stakeholders interested in addressing this challenge and are currently considering both short and long-term potential remedies. We believe prompt action is the right step at this point.

As such, with the knowledge and approval of the Juneau County Health Department and the County's Land and Water Resources Department, starting today, we are offering to purchase and install a point-of-use water treatment system for your home at no cost to you. Installation of this system will help ensure that you and your family have ongoing access to clean drinking water. We want to make sure the water from your kitchen sink or refrigerator meets state and federal drinking water standards. We believe this system will help ensure the standards are met. With your approval, we will help coordinate delivery and installation of the point-of-use water treatment system. It should be noted that such systems are effective so long as a well is code compliant and that it is properly installed by a licensed plumber.

In the short term, for those who want us to install a point-of-use system, we will provide you with complimentary bottled water for your use. If needed, the Armenia Growers Coalition will replenish this bottled water until your point-of-use system is installed.

Please call 715.335.8486 from 8 a.m. – 4 p.m. Monday through Friday to discuss and schedule the installation of the point-of-use water treatment system and coordinate bottled water delivery to your home. We would also be happy to visit you at your home to talk about this in-person.

More discussion can and should be held about how the elevated levels of nitrate came to be, including a better understanding of older, legacy farming practices. Today, we are working to ensure our neighbors have access to safe drinking water that meets state and federal standards. We are committed to responding to this issue in a positive manner, and we believe that working with our neighbors to provide the assistance outlined here is the best first step in doing that.

Please contact us at the number above to discuss this matter, schedule the installation of the point-of-use water treatment system and coordinate bottled water delivery to your home. Thank you again for your time, and we look forward to hearing from you.

Respectfully,

Armenia Growers Coalition

P.O. Box 330 Bancroft, WI 54921-0330 Phone: 715-335-8486

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ARMENIA GROWERS COALITION

FOR MORE INFORMATION

PLEASE CONTACT:

TIM HUFFCUTT

715-218-3487

Tim.Huffcutt@rpespud.com

Tim Huffcutt, a spokesperson for the Armenia Growers Coalition, today issued the following statement:

"The Armenia Growers Coalition and its member farms—Wysocki Produce Farms, B&D Farms and Okray Farms—recognize the concerns with elevated levels of nitrate recently identified in some potable wells in the area. We are committed to being a part of the solution and are currently reviewing both short and long-term remedies. Right now, our coalition is communicating with homeowners in the area and discussing ways to help make sure their water meets state and federal standards. This includes installing in those homes at no charge a point-of-use water treatment system that will be effective so long as the well is code compliant and the system is properly installed by a licensed plumber. The Coalition is also providing bottled water to those who decide to have a point-of-use water treatment system installed. As more information becomes available, additional homes in this area with private, potable wells may also be included in this effort. We are taking these steps with the knowledge and approval of the Juneau County Health Department and the County's Land and Water Resources Department.

"The cause is possibly due to legacy farming practices from decades ago, and this topic certainly deserves more discussion. But at this time, the Coalition believes it is important to take immediate action to provide impacted households with clean and safe drinking water. Installing a point-of-use water treatment system at no charge to residents and providing bottled water to those homes are two good first steps, and that's what we are focused on at the Armenia Growers Coalition.

"Our Coalition's employees and their families also live in this area, and our common interest is providing solutions so that clean water is available for all impacted homes. We're committed to responding to these concerns, working with our neighbors to provide assistance and developing a long-term solution that can be implemented."

August 3, 2018

Mr. David A. Crass
Michael Best
One South Pinckney Street
Suite 700
Madison, WI 53703

Re: Armenia Growers Coalition

Dear Mr. Crass:

The Wisconsin Department of Natural Resources (WDNR) and the United States Environmental Protection Agency (EPA) appreciate the proposal put forth by the Armenia Growers Coalition (AGC) during our July 30, 2018 meeting in Madison, Wisconsin and the actions AGC has already taken to act on the proposal. As promised at the meeting, the agencies are providing feedback on certain matters proposed by AGC.

1. Alternative Water Supplies for Well Owners with Groundwater Exceeding 10 mg/l Nitrate Contamination

AGC indicated at the meeting that it is willing to provide bottled water as soon as contact can be made with the impacted well owners. Based on sampling conducted by EPA and the counties, we know of homes in the Study Area¹ that currently have well water with nitrate contamination greater than 10.0 mg/l. We understand that AGC has taken steps to notify these homeowners and stands ready to provide bottled water for all of the affected homeowners as soon as possible. The agencies expect that AGC will provide bottled water to residences via direct delivery or by other means acceptable to the homeowner.

2. Long-Term Treatment Systems for Well Owners with Groundwater Exceeding 10 mg/l Nitrate Contamination

AGC indicated at the meeting and in its recent communications to the homeowners that it will offer to install point-of-use treatment systems at the known impacted homes. We understand that AGC will also include a replacement filter for each homeowner to install. At the time of our meeting, AGC was still in the process of determining which type of treatment system it intended to propose (reverse osmosis, ion exchange, etc.).

what about these homes?

¹ The Study Area includes those portions of Juneau and Wood County west of Lake Potosi and included in EPA and the counties' latest sampling efforts. The Study Area may include other areas adjacent to or downgradient of fields associated with AGC operations

The agencies support the Coalition's offer to install point-of-use treatment systems. To meet federal drinking water standards, those systems must be able to successfully treat the contaminated groundwater to 10.0 mg/l nitrate or below. The agencies understand that AGC has offered to install such systems at each of the impacted residences. Before AGC decides on a preferred system, the agencies would like the opportunity to review and comment on the proposed systems to ensure that the technology is consistent with state requirements and likely sufficient to treat the levels of contamination known to exist at the residences.

The agencies are concerned about the ability of homeowners to perform the necessary long-term maintenance of the point-of-use treatment systems. The agencies believe that long-term maintenance of the treatment systems should be provided until nitrate levels in the untreated water are consistently below 10 mg/l, and we would like to further discuss the long-term maintenance of the systems with AGC.

We would also like to discuss AGC's commitment should an installed treatment system not effectively reduce nitrate concentrations to or below 10.0 mg/l. The agencies would expect AGC to provide bottled water as needed until a more effective solution is implemented.

3. Long-Term Monitoring and Additional Sampling

We discussed long-term monitoring during the July 30 meeting, although AGC did not make a specific proposal concerning monitoring. The agencies believe a monitoring plan for all residences in the Study Area is needed and we are willing to discuss options for such monitoring, including potential roles for the agencies, counties, AGC, and perhaps others. The plan should include confirmatory and routine sampling for treatment system effectiveness, and routine monitoring of all the private wells within the Study Area.

As part of this effort, the agencies request that AGC take steps to sample the wells of those homes within the Study Area that have not already been sampled. If there are other wells with nitrate contamination greater than 10.0 mg/l, these homeowners should also be offered bottled water and long-term point of use treatment systems.

4. EPA Involvement

As discussed during our meeting, EPA needs to be kept up to date on the progress of the proposed activities outlined above. DNR has offered to be the point of contact for AGC to keep EPA informed.

5. Reporting

The agencies understand that interest in the water quality in the Central Sands region will remain after the immediate needs of impacted residents are addressed. Therefore, we believe that further discussion is needed on how information can be provided to the agencies and interested members of the public.

6. Memorandum of Understanding

During the meeting, AGC suggested that a Memorandum of Understanding (MOU) among AGC, the counties, and perhaps the State was under consideration. Although EPA would not be a signatory to the MOU, the agencies believe that there should be a binding agreement to implement the necessary actions. We welcome the opportunity to work with you to prepare an MOU, or other enforceable document, to spell out roles and responsibilities, commitments, procedures, schedules, deliverables, and contingencies.

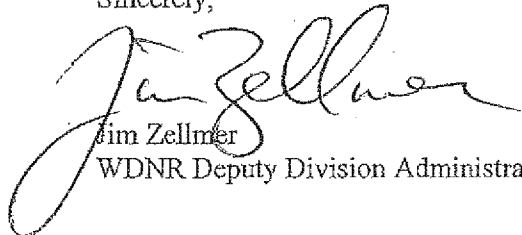
7. Long-Term Source Control

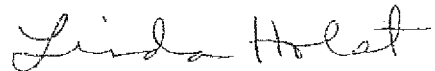
Control of nitrate sources was discussed during the July 30 meeting and there was general agreement that the issue is critical to addressing the long-term nitrate problem in the Central Sands area. The agencies propose a dialogue for discussing agricultural practices that would reduce nitrate levels in groundwater in the Central Sands area. The agencies understand that this effort may involve many parties, including the agencies, counties, AGC, academia, and others.

Conclusion

We commend AGC for its proposal and its recent actions to provide water to affected homeowners. The agencies want to continue the dialog that has been taking place and we are willing to meet or have a conference call with AGC and the counties as soon as possible to continue to advance these matters in a manner that is protective of human health. Please contact WDNR Deputy Division Administrator Jim Zellmer at (608) 267-7651 and EPA Region 5 Acting Water Division Director Linda Holst at (312) 886-6758.

Sincerely,


Jim Zellmer
WDNR Deputy Division Administrator


Linda Holst
EPA Region 5 Acting Water Division Director